

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

IN RE:

Bruce D Goodman
Karin L Goodman
Debtors

Case No: 15-33610
(Chapter 13)

JUDGE GUY R. HUMPHREY

**CHAPTER 13 TRUSTEE'S OBJECTION TO APPROVAL
OF AMENDED MODIFIED PLAN (DOC 94)**

The Chapter 13 Trustee objects to approval of the Debtors' amended modified plan (Doc 94), and as provided by 11 U.S.C. §1302(b)(2)

recommends the plan not be approved, all as more fully set forth in the attached memorandum.

The plan was confirmed on July 14, 2016 and was last modified on September 26, 2019.

_____/s/ John G. Jansing_____
John G Jansing #0040926
Chapter 13 Trustee
131 N. Ludlow St. Suite 900
Dayton, OH 45402-1161
(937) 222-7600 FAX (937) 222-7383
email: chapter13@dayton13.com

15-33610 GOODMAN

The Debtors have filed an amended modified plan that leaves the monthly plan payment set at \$775.00 and the percent to be paid to the general unsecured creditors remains set at 100%.

The Trustee's analysis is that the plan will not complete in 60 months as required by 11 U.S.C. §1322(d) (or in 84 months pursuant to the CARES Act). The plan appears to be closer to a 523 month plan. The Trustee's further analysis is that the plan would need payments of \$5800.00 per month to complete in 60 months (or in 84 months pursuant to the CARES Act).

The Debtors' plan payments are delinquent in the amount of \$3100.00 since being placed on plan payment probation pursuant to an agreed order (Doc. 84) filed March 5, 2020. The Debtors should have paid \$3100.00 in to the plan since being placed on probation but have failed to make a single plan payment to date.

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CERTIFICATE OF SERVICE

15-33610

I hereby certify that a copy of the Chapter 13 Trustee's Objection To Approval Of Amended Modified Plan was served **electronically** on the date of the filing through the Court's ECF System on all ECF participants registered in this case at the email address registered with the court and by **First Class Mail** on August 19, 2020 addressed to:

Bruce D Goodman
3741 Marshall Road
Kettering, OH 45429

Karin L Goodman
151 Taylors Trace
Albany, KY 42602

John G Jansing, Trustee

/s/ John G Jansing